Southern Nuclear

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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of 2.1.02.12a.iii [Index Number 55]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria ITAAC item 2.1.02.12a.iii [Index Number 55] for verifying the automatic depressurization valves identified in Table 2.1.2-1 perform an active safety-related function to change position as indicated in the table. The closure process for this ITAAC is based on the guidance described in NEI 08-01, “Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52,” which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,

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Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.1.02.12a.iii [Index Number 55]

JMC/TL/sfr

cc: Regional Administrator, Region ll
Director, Office of Nuclear Reactor Regulation (NRR)
Director, Vogtle Project Office NRR
Senior Resident Inspector – Vogtle 3 & 4

Southern Nuclear Operating Company
ND-23-0325
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.1.02.12a.iii [Index Number 55]

ITAAC Statement

Design Commitment

12.a) The automatic depressurization valves identified in Table 2.1.2-1 perform an active safety-related function to change position as indicated in the table.

Inspections/Tests/Analyses

iii) Tests of the motor-operated valves will be performed under pre-operational flow, differential pressure and temperature conditions.

Acceptance Criteria

iii) Each motor-operated valve changes position as indicated in Table 2.1.2-1 under pre-operational test conditions.

ITAAC Determination Basis

Multiple ITAAC are performed to verify that the Automatic Depressurization System (ADS) valves identified in Table 2.1.2-1 perform an active safety-related function to change position as indicated in the table. This ITAAC verified each motor-operated valve (MOV) changed position as indicated in Table 2.1.2-1 under preoperational test conditions. These valves were also tested or type tested under design conditions and a report exists that concludes that each motor-operated valve changes position as indicated in Table 2.1.2-1 under design conditions, as required by ITAAC 2.1.02.12a.i (NRC Index No. 53) (Reference 4).

Testing was performed in accordance with Unit 4 preoperational test procedure 4-PXS-ITPP-505 (Reference 1), as documented in SV4-PXS-ITR-800055 (Reference 2), to verify that each motor-operated valve changed position as indicated in Attachment A under preoperational test conditions.

Testing was performed sequentially on each ADS stage which has an A and B train and each MOV was operated using the Component Interface Module (CIM). The valves were tested one stage at a time and the tested valves were initially verified locally and in the Main Control Room (MCR) to be in the Closed position. Starting with the first train of the first stage of ADS, testing was performed on the MOVs with the pressurizer at 2235 psig ± 30 psig. Each ADS first stage isolation MOV was opened pressurizing the downstream line and verified to Open. Each ADS first stage MOV was then closed and the corresponding downstream ADS first stage MOV (control valve) was opened under pressure and verified to Open. This same test was repeated for each train of the second and third stage ADS MOVs with the pressurizer at 1200 psig ± 30 psig and 500 psig ± 30 psig, respectively. Note, the fourth-stage ADS MOVs are normally open and do not have an active function to transfer closed.

The completed Unit 4 test results verify that each motor-operated valve changed position as indicated in Table 2.1.2-1 under preoperational test conditions and were documented in Reference 2.

References 1 and 2 are available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.1.02.12a.iii (Reference 3) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.1.02.12a.iii was performed for VEGP Unit 4 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. 4-PXS-ITPP-505, Rev. 1, “ADS Stages 1-3 MOV Dynamic Test”
2. SV4-PXS-ITR-800055, Rev 0, “Unit 4 Recorded Results of ADS Stages 1-3 MOV Dynamic Test: ITAAC 2.1.02.12a.iii NRC Index Number: 55”
3. 2.1.02.12a.iii-U4-CP-Rev0, ITAAC Completion Package
4. ND-22-0689, ITAAC Closure Notification on Completion of ITAAC 2.1.02.12a.i (Index Number 53), dated November 3, 2022 (ADAMS accession number ML22307A325)

Attachment A

*** Excerpt from COL Appendix C Table 2.1.2-1**

Equipment Name *	Tag No. *	Active Function *
First-stage ADS Motor-operated Valve (MOV)	RCS-PL-V001A	Transfer Open
First-stage ADS MOV	RCS-PL-V001B	Transfer Open
Second-stage ADS MOV	RCS-PL-V002A	Transfer Open
Second-stage ADS MOV	RCS-PL-V002B	Transfer Open
Third-stage ADS MOV	RCS-PL-V003A	Transfer Open
Third-stage ADS MOV	RCS-PL-V003B	Transfer Open
First-stage ADS Isolation MOV	RCS-PL-V011A	Transfer Open
First-stage ADS Isolation MOV	RCS-PL-V011B	Transfer Open
Second-stage ADS Isolation MOV	RCS-PL-V012A	Transfer Open
Second-stage ADS Isolation MOV	RCS-PL-V012B	Transfer Open
Third-stage ADS Isolation MOV	RCS-PL-V013A	Transfer Open
Third-stage ADS Isolation MOV	RCS-PL-V013B	Transfer Open